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April 5, 2011

BY HAND DELIVERY

Honorable Victor Marrero United States District Judge United States District Court Southern District of New York 500 Pearl Street, Suite 660 New York, New York 10007

SDC SDNY DOCU (ENT ELECTRONICALLY FILED

Re:

Hausler v. The Republic of Cuba, et al.

09 Civ. 10289/18 MS 302

Dear Judge Marrero:

We are counsel to Jeanette Hausler, the Petitioner in the above-captioned judgment enforcement proceeding. We write to request that the Court grant a 180-day extension of certain levies of a Writ of execution issued by the Clerk herein, which levies occurred on January 19 and January 21, 2011. A copy of the Writ of execution (the "Writ") and Marshal's receipts indicating the levies are attached hereto respectively as Exhibits A and B.

As to the institutions upon which the Marshal has levied the Writ, Petitioner has filed turnover petitions concerning accounts at ABN AMRO (now Royal Bank of Scotland N.V.) and UBS AG; however, she has not moved for turnover with respect to all levied accounts at those two institutions. Moreover, Petitioner has not moved for turnover relief as to the other institutions referenced in the Writ. Thus, although the filings preserve the levy of the Writ as to the accounts that are the subject of the petitions, they do not preserve the levy as to the accounts and institutions. Petitioner intends to file one or more additional turnover petition(s), but is not yet in a position to do so, as we continue to work to identify the accounts for which turnover is appropriate.

¹ Under New York law (as applied through Federal Rule of Civil Procedure 69), a levy is valid for ninety days from the service of the execution, and will remain effective thereafter if the creditor has either filed a turnover petition within such time or the Court grants an extension of the levy. CPLR 5232(a).

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Accordingly, Petitioner respectfully requests that the Court grant a 180-day extension of the referenced levies covering the accounts which are not yet the subject of a turnover petition, but which are held by the Banks listed in the Writ.

Respectfully submitted,

James W. Perkins

Enclosures

cc: James L. Kerr, Esq. (by e-mail; w/ encl.)
David A. Baron, Esq. (by e-mail; w/ encl.)
Roberto Martinez, Esq. (by e-mail; w/ encl.)
Janis M. Meyer Esq. (by e-mail; w/ encl.)

Request GRANTED. The theme for petitions to levy on the Writ of Execution herein dated 1-4-1/10 extended by 180 days from the date of its expendences now in effect.

SO ORDERED:

H-6-1/
DATE SICTORMARAERO, U.S.D.J.